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 10 Attorneys for Defendants  
 11 Lee's General Toys, Inc., and  
 12 John Lee  
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UNITED STATES DISTRICT COURT  
 FOR THE SOUTHERN DISTRICT OF CALIFORNIA

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 14 GEORGIA-PACIFIC CONSUMER  
 15 PRODUCTS LP, a Delaware limited  
 16 partnership,

CASE NO. O7 CV 2391  
 (JAH POR)

DEFENDANTS OBJECTIONS  
 TO DECLARATION OF ZHIJUNXU  
 XU FILED IN SUPPORT  
 OF PLAINTIFF GEORGIA-  
 PACIFIC'S REPLY TO OPPOSITION  
 TO SUPPLEMENTAL BRIEF IN  
 SUPPORT OF MOTION FOR  
 PRELIMINARY INJUNCTION

Plaintiff, )  
 vs. )  
 LEE'S GENERAL TOYS, INC., a California )  
 corporation, JOHN LEE, an individual; and )  
 DOES 1-10. )

Defendants.

Defendants Lee's General Toys, Inc. and John Lee respectfully object to the Declaration  
 of Zhijun Xu Filed in Support of Plaintiff Georgia-Pacific's Reply to Opposition to  
 Supplemental Brief in Support of Motion for Preliminary Injunction:

LAW OFFICES  
 KAZANJIAN & MARTINETTI  
 520 EAST WILSON AVENUE  
 SUITE 250  
 GLENDALE, CALIFORNIA 91206

- 1 . Defendants respectfully object to the Declaration of Z. Xu, the Baker & Mackenzie  
2 associate, on the following grounds: Paragraph d) 3), page 1, lines 19-20. The claim  
3 that Ms. Zhang admitted that ANGEL SOFT was "a famous brand" is hearsay if used  
4 to prove the truth of the matter; if used as notice, the statement lacks foundation as to  
5 when Ms. Zhang had knowledge that it was allegedly "a famous brand." Since she  
6 might have acquired that knowledge the same day as the interview, the statement is  
7 overbroad, too. Also, there is no foundation that the declarant knew who Ms. Zhang  
8 was and recognized her voice and that she had any connection with the paper  
9 company. In addition, since there is no foundation as to who Ms. Zhang was, and that  
10 she was authorized to speak for the Runhui company; the alleged statement that  
11 Runhui would be "willing to produce" Angelite again should be disregarded also on  
12 the grounds that it is hearsay if used to prove the truth of the matter.
- 13 2. Defendants respectfully object to the Declaration of Z. Xu on the following grounds:  
14 Paragraph B) b), page 1, lines 27-28. The claim that Mr. Lin Hui Zhong admitted he  
15 was aware that ANGEL SOFT was a "brand toilet paper in the United States" lacks  
16 foundation in that there is no knowledge that Mr. Zhong worked for the Shanton Kid  
17 Toys Co., that the declarant's staff member knew Mr. Zhong's voice, that the staff  
18 member recognized the voice and could identify it as belonging to a person who  
19 worked for Shantou Kid Toys and was familiar with toilet products in the United  
20 States.  
21

22 Dated: March 14, 2008

23 KAZANJIAN & MARTINETTI  
RONALD MARTINETTI, ESQ.

24 By Ron Martinetti  
25 Ronald Martinetti  
26 Attorneys for Defendants  
27  
28

1 PROOF OF SERVICE BY MAIL - (1013a, 2015.5 C.C.P.)  
 2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

3 I am employed in the county of Los Angeles, State of California. I am over the age of  
 4 eighteen years and not a party to the within above-entitled action; my business address is 520 E.  
 Wilson Ave., Suite 250, Glendale, California 91206.

5 On March 14, 2008 I served the foregoing **DEFENDANTS OBJECTIONS TO**  
**6 DECLARATION OF ZHIJUNXU XU FILED IN SUPPORT OF PLAINTIFF GEORGIA**  
**7 PACIFIC'S REPLY TO OPPOSITION TO SUPPLEMENTAL BRIEF IN SUPPORT OF**  
**MOTION FOR PRELIMINARY INJUNCTION** on all the interested parties in this action as  
 follows:

8 Stephen P. Swinton, Esq.  
 9 Adam A. Welland, Esq.  
 Latham & Watkins LLP  
 10 12636 High Bluff Drive, Suite 400  
 San Diego, CA 92130-2071  
 11 Fax No.: (858) 523-5450

12 X a true copy      an original

13 BY PERSONAL DELIVERY/VIA MESSENGER;

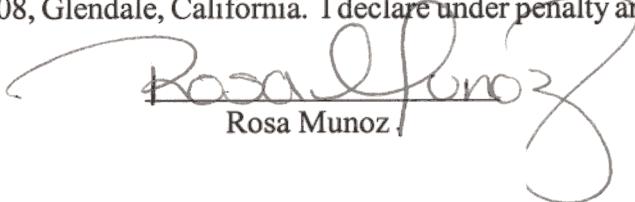
14 X **BY ELECTRONIC FILING:** I am familiar with the United States District Court, Southern  
 15 District of California's practice for collecting and processing electronic filings. Under that practice,  
 documents are electronically filed with the court. The court's CM/ECF system will generate a  
 16 Notice of Electronic Filing (NEF) to the filing party, the assigned judge, and any registered users in  
 the case. The NEF will constitute service of the document. Registration as a CM/ECF user  
 17 constitutes consent to electronic service through the court's transmission facilities. Under said  
 practice the above mentioned parties were served.

18       **PREPAID POSTAGE:** I deposited such an envelope in the mail at Glendale, California. The  
 envelope was mailed with postage thereon fully prepaid.

19       **U. S. MAIL:** I am "readily familiar" with our firm's practice of collection and processing  
 20 correspondence for mailing. It is deposited with the U.S. Postal Service on that same day on the  
 ordinary course of business. I am aware that on motion of any party served, service is presumed  
 21 invalid if postal cancellation date or postage meter date is more than one day after the date of deposit  
 for mailing affidavit.

22 X **BY FACSIMILE:** On the interested parties in this action pursuant to C.R.C. RULE 2009  
 23 (b). The telephone number of the facsimile machine I used was (818) 241-2193. This facsimile  
 machine complies with Rule 2003 (2) of the California Rules of Court. The transmission was  
 24 reported as complete and without error. The facsimile machine printed out a record indicating that  
 the transmission was successfully completed.

25 Executed on March 14, 2008, Glendale, California. I declare under penalty of perjury, that  
 26 the foregoing is true and correct.



Rosa Munoz